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Attorneys for Defendants PHH MORTGAGE  
CORPORATION and MSR ASSET VEHICLE LLC  
(formerly LIBERTY HOME EQUITY SOLUTIONS,  
INC.)

***(Caption continues on next page)***

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

MICHAELA LANERE, an individual, on  
behalf of herself, and on behalf of all  
persons similarly situated,

Plaintiffs,

v.

PHH MORTGAGE CORPORATION a New  
Jersey corporation, d/b/a LIBERTY  
REVERSE MORTGAGE; LIBERTY HOME  
EQUITY SOLUTIONS a  
California limited liability company and  
DOES 1-50, Inclusive,

Defendants.

Case No. 2:24-cv-00652-DJC-DB

**STIPULATION TO CONTINUE CASE  
DEADLINES AND ORDER**

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1 Plaintiff Michaela Lanere and Defendants PHH Mortgage Corporation (“PHH”)  
2 and MSR Asset Vehicle LLC (formerly Liberty Home Equity Solutions, Inc.) (“Liberty”)  
3 (collectively the “Parties”) hereby submit this Stipulation to Continue Case Deadlines.

4 The Parties stipulate as follows:

5 1. On January 23, 2024, Plaintiff filed her wage-and-hour putative class action  
6 against Defendants PHH, Liberty, Ocwen Financial Insurance Services, Inc., and Ocwen  
7 USVI Services, LLC in the Superior Court of California for the County of Sacramento.

8 2. On February 29, 2024, PHH and Liberty removed this action to the United  
9 States District Court, Eastern District of California.

10 3. On March 5, 2024, the Parties met and conferred to discuss Defendants’  
11 anticipated Motion to Dismiss and/or Strike Plaintiff’s Complaint and Plaintiff’s  
12 anticipated Motion to Remand. The Parties also discussed mediation and potential  
13 settlement of the case.

14 4. During the meet and confer, Plaintiff agreed to amend her Complaint to  
15 address some of the issues Defendants raised regarding the parties, claims and  
16 allegations, and she filed her First Amended Complaint (“FAC”) on March 6, 2024. The  
17 Parties also agreed to mediate the matter and requested a 60-day continuance of case  
18 deadlines to allow time for the Parties to agree on a mediator, reserve a mediation date  
19 and explore potential resolution of this matter, which the Court granted. See Dkt No. 10.

20 5. The Parties have since scheduled mediation on July 24, 2024 and now  
21 agree to seek an additional 90-day continuance of case deadlines to allow the Parties to  
22 mediate and explore potential resolution of the matter.

23 6. PHH and Liberty’s deadline to file their responsive pleading to Plaintiff’s  
24 FAC is currently May 20, 2024.

25 7. Plaintiff’s deadline to file her Motion to Remand is currently May 31, 2024.

26 8. The deadline for the Parties to meet and confer and submit a Joint Status  
27 report is currently June 28, 2024.

28 9. Accordingly, to promote judicial economy and efficiency, the Parties

request that the Court continue the case deadlines by 90-days as follows:

- a. Deadline for PHH and Liberty to file a responsive pleading: **August 19, 2024**;
- b. Deadline for Plaintiff to file her Motion to Remand: **August 29, 2024**;  
and
- c. Deadline for Parties to meet and confer and submit a Joint Status Report as required by the Court's Initial Case Management Order and Federal Rules of Civil Procedure 26(f): **September 26, 2024**.

IT IS SO STIPULATED.

Dated: May 13, 2024

JULIE A. TOTTEN  
ANNIE H. CHEN  
FRANK N. ZALOM

ORRICK, HERRINGTON & SUTCLIFFE  
LLP

By: /s/ Annie H. Chen  
ANNIE H. CHEN  
Attorneys for Defendants PHH  
MORTGAGE CORPORATION and  
MSR ASSET VEHICLE LLC (formerly  
LIBERTY HOME EQUITY  
SOLUTIONS, INC.)

Dated: May 13, 2024

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LANERE

**ORDER**

The Court having considered the Parties' Stipulation to Continue Case Deadlines and finding good cause, hereby GRANTS the Parties' request to continue case deadlines and ORDERS as follows:

1. The deadline for PHH and Liberty to file a responsive pleading is continued to August 19, 2024;

2. The deadline for Plaintiff to file a Motion to Remand is continued to August 29, 2024; and

3. The deadline for the Parties to meet and confer and submit a Joint Status Report as required by the Court's Initial Case Management Order and Federal Rules of Civil Procedure 26(f) is continued to September 26, 2024.

DATED this 13<sup>th</sup> day of May, 2024.

/s/ Daniel J. Calabretta

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THE HONORABLE DANIEL J. CALABRETTA  
UNITED STATES DISTRICT JUDGE